

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Statement of Issues Against:

**CHARLOTTE ALEXANDRIA GULLAP-MOORE**

Applicant for Registered Nurse License

Respondent

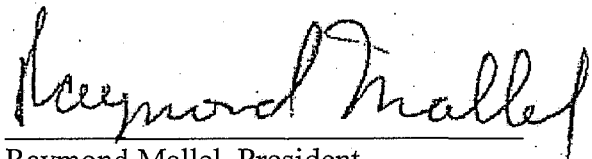
Case No. 2012-663

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary order for Public Reprimand is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on May 22, 2013.

IT IS SO ORDERED April 22, 2013.



Raymond Mallel, President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 MARC D. GREENBAUM  
Supervising Deputy Attorney General  
3 MICHAEL A. CACCIOTTI  
Deputy Attorney General  
4 State Bar No. 129533  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2932  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
9 **STATE OF CALIFORNIA**

10 In the Matter of the Statement of Issues  
11 Against:

12 **CHARLOTTE ALEXANDRIA GULLAP-**  
13 **MOORE**

14 Respondent.

Case No. 2012-663

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER FOR PUBLIC**  
**REPROVAL**

[Bus. & Prof. Code § 495]

15 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
16 entitled proceedings that the following matters are true:

17 PARTIES

18 1. LOUISE R. BAILEY, M.ED., RN (Complainant) is the Executive Officer of the  
19 Board of Registered Nursing. She brought this action solely in her official capacity and is  
20 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by  
21 Michael A. Cacciotti, Deputy Attorney General.

22 2. Respondent Charlotte Alexandria Gullap-Moore (Respondent), misspelled "Charlotte  
23 Alexandria Gulap-Moore" in the Statement of Issues pleading, is represented in this proceeding  
24 by attorney Scott Harris, whose address is: Scott Harris, Esq. 8383 Wilshire Boulevard, Suite 830  
25 Beverly Hills, CA 90211.

26 3. On or about March 7, 2011, the Board of Registered Nursing, Department of  
27 Consumer Affairs received an application for a Registered Nurse License from Respondent. On  
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1 or about March 4, 2011, Respondent certified under penalty of perjury to the truthfulness of all  
2 statements, answers, and representations in the application. The Board denied the application on  
3 June 30, 2011.

4 JURISDICTION

5 4. Statement of Issues No. 2012-663 was filed before the Board of Registered Nursing  
6 (Board), Department of Consumer Affairs, and is currently pending against Respondent. The  
7 Statement of Issues No. 2012-663 and all other statutorily required documents were properly  
8 served on Respondent on May 18, 2012. Respondent timely filed her Notice of Defense  
9 contesting the Statement of Issues. A copy of Statement of Issues No. 2012-663 is attached as  
10 exhibit A and incorporated herein by reference.

11 ADVISEMENT AND WAIVERS

12 5. Respondent has carefully read, fully discussed with counsel, and understands the  
13 charges and allegations in Statement of Issues No. 2012-663. Respondent has also carefully read,  
14 fully discussed with counsel, and understands the effects of this Stipulated Settlement and  
15 Disciplinary Order for Public Reproval.

16 6. Respondent is fully aware of her legal rights in this matter, including the right to a  
17 hearing on the charges and allegations in the Statement of Issues; the right to be represented by  
18 counsel at her own expense; the right to confront and cross-examine the witnesses against her; the  
19 right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas  
20 to compel the attendance of witnesses and the production of documents; the right to  
21 reconsideration and court review of an adverse decision; and all other rights accorded by the  
22 California Administrative Procedure Act and other applicable laws.

23 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
24 every right set forth above.

25 CULPABILITY

26 8. Respondent admits the truth of each and every charge and allegation in Statement of  
27 Issues No. 2012-663.  
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9. Respondent agrees that her Application for Registered Nurse License is subject to discipline and she agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

## CONTINGENCY

10. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order for Public Reprimand shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order for Public Reproval, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Settlement and Disciplinary Order for Public Reapproval is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary Order for Public Reapproval may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

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1 DISCIPLINARY ORDER

2 IT IS HEREBY ORDERED that Application of Respondent Charlotte Alexandria Gullap-  
3 Moore for licensure as a Registered Nurse is hereby granted. Upon successful completion of the  
4 licensing requirements including payment of fees, a license shall be issued to Respondent. The  
5 license issued to Respondent shall, by way of letter from the Board's Executive Officer, be  
6 publicly reprovod. The letter shall be in the same form as the letter attached as Exhibit B to this  
7 stipulation.

8 ACCEPTANCE

9 I have carefully read the above Stipulated Settlement and Disciplinary Order for Public  
10 Reproval and have fully discussed it with my attorney, Scott Harris. I understand the stipulation  
11 and the effect it will have on my Application for Registered Nurse License. I enter into this  
12 Stipulated Settlement and Disciplinary Order for Public Reproval voluntarily, knowingly, and  
13 intelligently, and agree to be bound by the Decision and Order of the Board of Registered  
14 Nursing.

15 DATED: Oct 2, 2012

Charlotte A. Gullap-Moore  
16 CHARLOTTE ALEXANDRIA GULLAP-MOORE  
Respondent

17 I have read and fully discussed with Respondent Charlotte Alexandria Gullap-Moore the  
18 terms and conditions and other matters contained in the above Stipulated Settlement and  
19 Disciplinary Order for Public Reproval. I approve its form and content.

20 DATED: 10/5/2012

Scott Harris  
21 SCOTT HARRIS  
Attorney for Respondent

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ENDORSEMENT

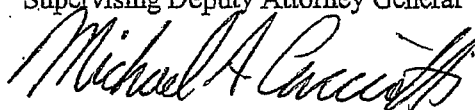
The foregoing Stipulated Settlement and Disciplinary Order for Public Reapproval is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated:

10/10/12

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
MARC D. GREENBAUM  
Supervising Deputy Attorney General



MICHAEL A. CACCIOTTI  
Deputy Attorney General  
Attorneys for Complainant

LA2011506007  
Stipulation for public reapproval.rtf

**Exhibit A**

**Statement of Issues No. 2012-663**

1 KAMALA D. HARRIS  
Attorney General of California  
2 MARC D. GREENBAUM  
Supervising Deputy Attorney General  
3 MICHELLE McCARRON  
Deputy Attorney General  
4 State Bar No. 237031  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2544  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

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8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Statement of Issues  
11 Against:

Case No. 2012-663

12 **CHARLOTTE ALEXANDRIA GULAP-**  
13 **MOORE**

**STATEMENT OF ISSUES**

14 **Applicant for Registered Nurse License**

15 Respondent.

16 Complainant alleges:

17 **PARTIES**

18 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Statement of Issues solely in  
19 her official capacity as the Interim Executive Officer of the Board of Registered Nursing,  
20 Department of Consumer Affairs.

21 2. On or about March 7, 2011, the Board of Registered Nursing, Department of  
22 Consumer Affairs received an application for a/an Applicant for Registered Nurse License from  
23 Charlotte Alexandria Gulap-Moore (Respondent). On or about March 4, 2011, Charlotte  
24 Alexandria Gulap-Moore certified under penalty of perjury to the truthfulness of all statements,  
25 answers, and representations in the application. The Board denied the application on June 30,  
26 2011.

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1 New Jersey Board of Nursing and the Pennsylvania Board of Nursing. The circumstances are as  
2 follows:

3 a. On or about June 7, 2006, the New Jersey Board of Nursing issued a reprimand  
4 to Respondent, alleging repeated acts of negligence. The circumstances surrounding the  
5 reprimand are that on or between July to September 2002, Respondent was a employed as a  
6 nurse in the Intensive Care unit at Saint Barnabes Medical Center, and she failed to properly  
7 withdraw and chart the administration of controlled substances including Morphine, Percocet, and  
8 Dilaudid in accordance with physician's orders on repeated occasions.

9 b. On or about June 30, 2009, the Pennsylvania State Board of Nursing ordered  
10 that a public reprimand be placed upon Respondent's license based on the reprimand issued by  
11 the New Jersey Board of Nursing. Complainant's allegations, as set forth in paragraph 7(a), are  
12 incorporated by reference as though fully set forth.

13 **SECOND CAUSE FOR DENIAL OF APPLICATION**

14 **(Committed Act that is Grounds for Suspension/Revocation)**

15 8. Respondent's application is subject to denial under section 480, subdivision (a)(3) in  
16 that Respondent committed acts that constitute grounds for suspension or revocation of a licensee.  
17 Complainant's allegations, as set forth in paragraph 7, subparagraphs (a) – (b), are incorporated  
18 by reference as though fully set forth.

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**PRAYER**

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Denying the application of Charlotte Alexandria Gulap-Moore for a Applicant for Registered Nurse License; and
2. Taking such other and further action as deemed necessary and proper.

DATED: April 27, 2012

*for*   
LOUISE R. BAILEY, M.ED., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

LA2011506007  
statement of issues.rtf

**Exhibit B**

**Letter of Public Reproval in Statement of Issues Case No. 2012-663**



April 22, 2013

Charlotte Alexandria Gullap-Moore  
3463 State Street, Suite 540  
Santa Barbara, CA 93105

RE: LETTER OF PUBLIC REPROVAL  
In the Matter of the Statement of Issues Against:  
Charlotte Alexandria Gullap-Moore, Applicant for Registered Nurse License

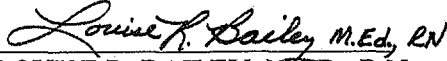
Dear Ms. Gullap-Moore:

On May 18, 2012, the Board of Registered Nursing, Department of Consumer Affairs, State of California, filed a Statement of Issues against your Application for a Registered Nurse License. The Statement of Issues alleged that you engaged in unprofessional conduct under Business and Professions Code section 2761, subdivision (a)(4), for license discipline in two other states. Between July 2002 and September 2002, you failed to properly withdraw and chart the administration of controlled substances in accordance with physician's orders on repeated occasions.

Taking into consideration the age of the offense, that you have submitted recent, dated exemplary statements and performance evaluations from your employer and persons in authority who have on-the-job knowledge of your current nursing competence, and other mitigating circumstances in this case which support the determination that you are safe to practice Registered Nursing, the Board has decided that the charges warrant a public reproof.

Accordingly, in resolution of this matter under the authority provided under Business and Professions Code section 495, the Board of Registered Nursing, Department of Consumer Affairs issues this letter of public reproof.

Sincerely,

  
LOUISE R. BAILEY, M.ED., R.N.  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California